

# NENA

## The 9-1-1 Association

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1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

September 12<sup>th</sup>, 2016

RE: *In the Matters of: Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications et al.*, PS Docket Nos. 15-80 & 11-82; ET Docket No. 04-35

Dear Madam Secretary:

As custodians of the United States' emergency calling system, the members of the National Emergency Number Association (NENA) have a keen professional interest in the continuous availability of 9-1-1 communications systems to the public. As such, we are pleased that the Commission has once again emphasized the importance of collecting, aggregating, and sharing data on network outages and their root causes. As the Commission correctly notes, the increasing carriage of services, including both legacy E9-1-1 and emerging NG9-1-1, on Broadband Internet Access Service ("BIAS") facilities does introduce both new tools to promote resiliency and new and more complex threats to service availability. Understanding and mitigating these threats will be a key challenge for the 9-1-1 community in the all-IP age. To that end, NENA reiterates our belief that *some* outage data collection mechanisms will be indispensable.

In particular, NENA believes that data on the frequency, duration, and scope of outages that materially impair 9-1-1 service for the public or for Public Safety Answering Points should be collected. These data can then be used to reduce the incidence of future outages. After carefully reviewing the Commission's proposals and the various stakeholder responses in this docket, however, NENA is unable to discern a single, clearly-preferable approach to capturing relevant outages while avoiding an over- or under-reporting problem. Consequently, NENA urges the Commission to re-engage the multi-stakeholder process that has proven successful in dealing with issues as complex and diverse as Text-to-9-1-1, Wireless Location Accuracy, and, most directly relevant here, 9-1-1 Governance and Reliability.

Although the scope of this proceeding is broader than that of the previous proceedings in which a multi-stakeholder process has been used, NENA believes that such a process can again be successful here. Specifically, we cite the multi-stakeholder process begun in the Governance and Reliability proceeding. Had that process continued apace, it might have provided a consensus view here. In order to re-kindle that process, however, NENA believes that it will require significant and sustained support and oversight by the Commission. We therefore further urge the Commission to establish clear and specific parameters, including a definite time-frame for the completion of multi-stakeholder consideration of these issues.

NENA stands ready to participate fully in a multi-stakeholder process, and would welcome a re-convening and expansion of the group that significantly advanced that process in the Governance and Reliability proceeding.

Finally, NENA wishes to emphasize one further point: The transition to all-IP networking is radically flattening network and service-system structures. Whatever approach the Commission ultimately settles on for outage reporting should recognize this, and establish a clear

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and *consistent* framework for both integrated Access Network / Originating Service Providers, and for ANPs that are not also OSPs.

Sincerely,

A handwritten signature in black ink, appearing to read "Trey Forgety", with a stylized flourish at the end.

Trey Forgety  
*Director of Government Affairs*